Case: 4:22-cv-00483-HEA Doc. #: 8 Filed: 04/28/22 Page: 1 of 22312 CC01946

IN THE CIRCUIT COURT OF ST. LOUIS COUNTY STATE OF MISSOURI

TAMARA CARLILE,)
Plaintiff,)) Cause No.
VS.) Division No.
) TRIAL BY JURY DEMANDED
WAL-MART ASSOCIATES, INC.)
Serve: Registered Agent)
CT Corporation System)
120 S. Clayton Avenue)
Clayton, MO 63105,)
)
Defendant.)

PETITION

Comes now Plaintiff Tamara Carlile and for her cause of action against Defendant Wal-Mart Associates, Inc., states as follows:

- 1. That Plaintiff is a resident of the State of Illinois.
- 2. That Defendant is a corporation, organized in the State of Missouri, and authorized to do business in the State of Missouri.
- 3. At all times herein mentioned, Defendant owned and/or managed Walmart Store #2213 located at 3270 Telegraph Road in St. Louis County, State of Missouri.
- 4. That the cause of action occurred on August 2, 2020, in St. Louis County, State of Missouri.
- 5. That on August 2, 2020, Plaintiff was a business invitee at the Walmart store #2213 located at 3270 Telegraph Road in St. Louis County, Missouri.
- 6. That on August 2, 2020, Plaintiff was walking on the premises of Walmart Store #2213 near the front registers when she slipped and fell.

Electronically Filed - St Louis County - March 29, 2022 - 09:36 AlV

7. That there was liquid on the floor that made the premises slick and otherwise

dangerous.

8. That Defendant knew or by using ordinary care could have known of the

unsafe condition referenced above, and/or created the unsafe condition referenced above,

and Defendant failed to use ordinary care to remove the unsafe condition, or barricade the

unsafe condition or warn of the unsafe condition.

9. That as a direct result of the carelessness and negligence of Defendant, Plaintiff

sustained serious, permanent personal injuries, including injuries to Plaintiff's left shoulder

and right knee, foot, and ankle. Plaintiff has incurred and will continue to incur medical

expenses.

WHEREFORE, Plaintiff Tamara Carlile prays for judgment against Wal-Mart

Associates, Inc., in an amount that is fair and reasonable, but in excess of twenty-five

thousand dollars (\$25,000.00), exclusive of interest and costs, for prejudgment interest,

postjudgment interest, costs and for whatever further relief this Court deems just and

proper.

/s/ Michelle Radice_

Michelle E. Radice #63181

MICHELLE E. RADICE, LLC

Attorneys for Plaintiff

2123 Marconi Avenue

St. Louis, MO 63110

(314) 656-6914

(314) 656-6915Fax

mradice@radicelawstl.com